

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELCOMMUNICATIONS AND ENERGY

Complaint of DSCI Corporation)	
For Declaratory Orders to Ensure)	Docket No. 05-28
Verizon-Massachusetts Compliance)	
With Resale Obligations with Respect)	
To Customer Specific Pricing Contracts)	

**FIRST SET OF INTERROGATORIES OF
DSCI CORPORATION TO VERIZON-MASSACHUSETTS**

1. Reference the Pre-Filed Testimony of Carolyn B. Jussaume (“Jussaume Testimony”), at p. 1, lines 5-14. Please detail the extent of Ms. Jussaume’s management responsibilities over the past three years, if any, with customer-specific pricing, individual case basis, or similar Verizon-Massachusetts (“Verizon”) contracts (collectively referred to as “CSPs”) involving Verizon enterprise business customers other than the Commonwealth of Massachusetts.
2. Reference the Jussaume Testimony at p. 5, lines 9-20. Please identify the five largest enterprise customer requests for information (“RFIs”), based on number of pages in the RFI, to which Verizon has responded over the past two years. Please provide complete copies of the referenced RFIs.
3. Reference the Jussaume Testimony at p. 5, lines 9-20. Please identify the five largest enterprise customer requests for proposals (“RFPs”), based on number of pages in the RFP, to which Verizon has responded over the past two years. Please provide complete copies of the referenced RFPs.
4. Reference the Jussaume Testimony at p. 7, lines 16-18. Please provide all documents referencing or codifying the “understanding that the class of customers that Verizon would be required to serve under the term of the Customer 38 and COMA CSPs” would be limited only to the Commonwealth itself and other “eligible entities.”
5. Reference the Pre-Filed Testimony of Pamela McCann (“McCann Testimony”) starting at p. 2 regarding development of a proposed “formal process to locate the requested CSPs and identify their principal terms for DSCI’s consideration (hereinafter referred to as “Proposed CSP Process”). Please:

- a. Identify the date by which Verizon intends to complete and circulate to DSCI a draft of the Proposed CSP process and associated forms.
 - b. Identify the proposed time periods for completing each step in the Proposed CSP Process (McCann Testimony at pp. 3-4).
 - c. Explain the circumstances in which a Retail CSP customer's name would need to be redacted from the summary of contract terms provided to DSCI or other requesting CLEC, given that Retail CSP customer names are commonly not redacted in the Department's CSP tariffs.
 - d. Confirm that the "summary of contract terms" provided to DSCI or other requesting CLECs will include a complete description of all material terms and conditions Verizon proposes to place on resale of the CSP.
6. Please provide a detailed description of the process and associated maximum time frames applied to requests by Verizon Retail for approval of CSP pricing to an existing or new Verizon retail enterprise customer. If the time frames applicable to processing Retail CSP pricing requests differ from those in the Proposed CSP Process for resale of CSPs by CLECs, please explain the basis for such differences.
7. Please provide a detailed description of the process and associated maximum time frames followed by Verizon Retail in seeking or responding to customer requests to extend, modify or terminate an existing CSP. If a Retail CSP subject to extension, modification or termination discussions is being resold to a CLEC, does Verizon intend to provide notice of the impending changes to the reselling CLEC. If so, please describe the nature of the proposed notices to the CLEC.
8. Reference the McCann Testimony at p. 5, lines 10-11. Please confirm that the acknowledgement letter signed by DSCI states that DSCI would comply with "all relevant terms and conditions of the COMA CSP" (emphasis added).
9. Reference the McCann Testimony at p. 5, line 19 through p. 6, line 5. Please reconcile the statement that DSCI would be able to resell the COMA CSP and Customer 38 CSP to "all of the customers Verizon serves under those agreements" with the statements in the COMA acknowledgement letter and e-mails that DSCI is precluded from reselling these agreements to any state agencies or eligible entities currently served by Verizon Retail.
10. Reference the McCann Testimony at p. 6, lines 12-13. Please identify the "tariff pricing" that will apply if usage volumes are not met in the absence of a renegotiated rate.

11. Reference the McCann Testimony at p. 6, line 22 to p. 7, line 8. Please identify the specific “local, toll, or circuit switched data optional calling plan/customer specific pricing (CSP) plan” that Verizon contends applies to the COMA Contract and is included in the language of the COMA CSP. To the extent Verizon contends that the reference in Tariff to the fact that “local and toll usage must be carried by the Telephone Company” constitutes a “plan,” please identify all Department precedents or other sources of law that support such contention.

DSCI CORPORATION

By its attorney,

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